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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fourteenth session,
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agenda item 4 (b))

GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Physical hazards

European Aerosol Federation (FEA) Position on Global Harmonisation Flammability Criteria of Aerosols

Transmitted by the European Aerosol Federation (FEA)

Background

At the Rio Summit meeting of Governments in 1992, it was agreed that there should be harmonisation of hazard classification in order to reduce obstacles to international trade and to reduce the burden on manufacturers.

The work on flammable liquids and gases was given to the United Nations Sub-Committee on the transport of dangerous goods. Several papers have been submitted concerning aerosols, from the USA, Norway, Germany and the UK. At the Geneva meetings in December 1997, the Sub-Committee will discuss the issue of aerosol classification again for the last time.

The European Commission has produced a paper setting out its position and believes that harmonisation on the current Transport Regulations basis of 45% flammable components is undesirable and that harmonisation should take place according to the revised EC Directive's classification principles for consumer use.

However, the hazard which exists during transport, storage and handling is quite different from the risk to the consumer when using the product. Under normal conditions the contents will be not be emptied during transport or handling; it will however during normal consumer use of the product.

Europe produces and consumes 4 billion of the world's 10 billion aerosols. It is therefore the largest sector in the global market for aerosols.

FEA Position

While understanding and sympathising with the intention of the global harmonisation initiative; the FEA does not believe that a single classification covering all situations is feasible.

Ideally, separate classification for transport, storage and handling on the one hand and consumer use on the other hand, should be maintained as these take account of completely different types of risk.

A simple transport classification and more complex consumer use classification is justified. For **transport**, FEA supports the current **UN recommendations on the transport of dangerous goods model regulations**.

To maintain a high safety level for **consumer** use, the FEA proposes to focus on the **parameters and results of a test method**, rather then describing the test method itself.
The results of the test will determine the flammability and explosion risks, leading to the appropriate classification for consumer use.
Test parameters should include that the test represents realistic and foreseeable circumstances of use; be reproducible and measurable. For Europe, it means to follow the existing EC Directive.

It is the intention of FEA to further work on harmonisation criteria of storage in close co-operation with the regulatory bodies and other aerosol associations around the world.

Arguments

Under the EC Aerosol Directive, aerosols are required to be leak and pressure tested at elevated temperature.

> The industry knows of no incidents in transport in Europe directly caused by aerosols in the last ten years, hence the FEA proposes to adhere to the existing UN recommendations.
>
> This FEA position is fully supported by the Chemical Specialities Manufacturers Association (CSMA), the American Aerosol Association.

The hazards are different for transport, storage and handling than for consumer use.

Under normal conditions during transport, storage and handling:

> the product is not released from the can
> the product is hermetically sealed in small containers (small quantities)

Under normal conditions during consumer use:

> The product is specifically intended to be released from the can (in small amounts)
> Because of the human factor, a consumer misuse should be taken into account

From the above it is clear that the risk during consumer use is significantly different than for transport.